



March 20, 2023

By ECF

Hon. Jesse M. Furman, U.S.D.J.
Thurgood Marshall Courthouse
40 Foley Square
New York, New York 10007

Re: Matthew Connolly v. Deutsche Bank AG, No. 22-CV-09811

Dear Judge Furman:

We represent Plaintiff, Matthew Connolly, in the above-captioned matter. We write to request the Court set a briefing schedule in the above-captioned matter. Judge McMahon's March 14, 2023 Order dissolved the protective order with respect to use of the grand jury transcripts and exhibits by both the Plaintiff and the Defendant in this matter. Copies of the grand jury materials in Plaintiff's possession were provided to Defendant on March 15 and 16. The parties met and conferred and respectfully request the Court enter the following schedule which follows the deadlines in Your Honor's Order of January 17, 2023 (Dkt. 21).

1. Defendant shall file an answer, a new motion to dismiss or a letter on ECF stating that it relies on the previously filed motion to dismiss by April 3, 2023.
2. If Defendant files a new motion to dismiss, any opposition shall be filed within four weeks, or no later than May 1, 2023.
3. Any reply shall be filed within three weeks of the opposition, or no later than May 22, 2023.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Julie Withers

Julie Withers

cc: Counsel for Defendant (via ECF)